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BHM Technologies Holdings, Inc.
The Brown Company of Waverly, LLC
The Brown Company of Moberly, LLC
The Brown Corporation de Saltillo, S. de R.L. de C.V.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In Re:	: Chapter 11 Case No.
	:
GENERAL MOTORS CORP., et al.,	: 09-50026 (REG)
	:
Debtors.	: (Jointly Administered)
	:
	: Hon. Robert E. Gerber
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**LIMITED OBJECTION BY BHM TECHNOLOGIES HOLDINGS, INC., THE BROWN
COMPANY OF WAVERLY, LLC, THE BROWN COMPANY OF MOBERLY, LLC,
AND THE BROWN CORPORATION DE SALTILLO, S. DE R.L. DE C.V. TO
NOTICE OF (I) DEBTORS' INTENT TO ASSUME AND ASSIGN CERTAIN
EXECUTORY CONTRACTS, UNEXPIRED LEASES OF PERSONAL PROPERTY,
AND UNEXPIRED LEASES OF NONRESIDENTIAL REAL PROPERTY
AND (II) CURE AMOUNTS RELATED THERETO**

BHM Technologies Holdings, Inc., The Brown Company of Waverly, LLC, The Brown Company of Moberly, LLC, and The Brown Corporation de Saltillo, S. de R.L. de C.V. (collectively, the "Supplier"), by and through its attorneys, Varnum LLP, hereby files this limited objection to the Notice of (i) Debtors' Intent to Assume and Assign Certain Executory Contract, Unexpired Leases of Personal Property, and Unexpired Leases of Nonresidential Real Property

and (ii) Cure Amounts Related Thereto, dated June 5, 2009 (the "Assignment Notice") as follows:

1. On June 1, 2009, the Debtors commenced these voluntary cases under chapter 11 of title 11 of the United States Code.

2. On June 2, 2009, this Court entered an Order approving the Debtors' bidding procedure [Docket No. 274], which includes a procedure regarding the Debtors' assumption and assignment of executory contracts (the "Procedures Order").

3. The Supplier has been told that the Assignment Notice was sent to it on June 5, 2009 by the Debtors' call center; however, as of today's date, the Supplier has not received a copy and the call center has refused to provide the Supplier access to the website.

4. The Debtors owe the Supplier \$5,467,409.70 for prepetition goods and/or services provided to the Debtors under the Debtors' tooling and production purchase orders and agreements with the Supplier (the "Supplier Cure Amount"). Attached as Schedule 1 is a listing of the invoices evidencing the Supplier Cure Amount. Copies are available upon request.

5. Out of an abundance of caution, the Supplier objects to the Assignment Notice to the extent that it does not accurately reflect the Supplier Cure Amount.

WHEREFORE, Creditor requests that the Court enter an order:

(A) Granting the Supplier a pre-petition cure amount for purposes of Section 365(b) of the Bankruptcy Code in the total amount of \$5,467,409.70 as a condition for the Debtors to assume and assign the Supplier Agreements pursuant to the Procedures Order; and

(B) Granting such other and further relief as the Court deems just and appropriate.

Respectfully submitted,

Varnum LLP

Dated: June 15, 2009

By: /s/ Mary Kay Shaver
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